## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
V	)	Criminal No. 25-10103-ADB
v.	)	Chiliniai No. 25-10105-ADD
MICHAEL MARSHALL,	)	
Defendant.	)	

## UNITED STATES' BILL OF PARTICULARS FOR FORFEITURE OF ASSETS

The United States of America, by and through its attorney, Leah B. Foley, United States Attorney for the District of Massachusetts, hereby files the following Bill of Particulars for Forfeiture of Assets.

On March 24, 2025, a the United States Attorney for the District of Massachusetts filed a two-count Information, charging defendant Michael Marshall (the "Defendant"), with Conspiracy to Distribute and to Possess with Intent to Distribute Anabolic Steroids and Other Controlled Substances, in violation of 21 U.S.C. § 846 (Count One); and Possession with Intent to Distribute Anabolic Steroids and Other Controlled Substances; Aiding and Abetting, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C); 18 U.S.C. § 2 (Count Two).

The Information included a Drug Forfeiture Allegation, which gave the Defendant notice that the United States intended to seek forfeiture, pursuant to 21 U.S.C. § 853, and upon conviction of the offenses set forth in Counts One and Two of the Information, of any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offenses; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

Pursuant to, and without limiting in any manner the Drug Forfeiture Allegation of the Information, the United States hereby gives notice that it is seeking forfeiture, without limitation, of the following specific property:

(a) 97 pairs of assorted sneakers, seized on or about March 7, 2024.

Dated: March 26, 2025

Respectfully submitted,

LEAH B. FOLEY United States Attorney,

By: <u>/s/ Brendan T. Mockler</u>

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